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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JUAN ALCAZAR, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

FASHION NOVA, INC., a California
corporation; and DOES 1 to 10, inclusive,

Defendants.

Case No.: 4:20-cv-01434-JST

CLASS ACTION

*Assigned to Hon. Jon S. Tigar
Courtroom 6*

**DECLARATION OF JON A. KROSNICK IN
SUPPORT OF FASHION NOVA, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Complaint filed: February 26, 2020
Trial Date: April 8, 2024

DECLARATION OF JON A. KROSNICK

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I, Jon A. Krosnick, do hereby declare as follows:

1. I am the Frederic O. Glover Professor of Humanities and Social Sciences and a Professor of Communication, Political Science, and (by courtesy) Psychology at Stanford University in Stanford, California, and a Research Psychologist at the U.S. Census Bureau.

2. Fashion Nova wishes to openly discuss and attach exhibits to the joint letter brief regarding expert discovery disputes. These discussions and exhibits include summaries of information from, quotes from, and the transcript, whole or excerpted, from my November 7, 2023 deposition wherein I was questioned about a document of mine which was produced inadvertently by Plaintiff and to which objection was made on the record.

3. The document discussed in the letter brief and transcript, whole or excerpted, from my November 7, 2023 deposition which Fashion Nova seeks to file under seal contain information that Plaintiff or third parties have designated confidential. Specifically, the document discussed in the transcript contains my analyses that are not yet released for peer review. My analyses are proprietary and have economic value to me, which will be eviscerated if left unsealed in the public record before peer review.

4. The relief requested in this motion is necessary and is narrowly tailored to protect confidential information, focusing only on specific exhibits and portions of the transcript at issue.

I declare under the penalty of perjury under the laws of the United States of America that the forgoing is true and correct to the best of my knowledge.

Executed November 20, 2023 in Wuhan, China.


Jon A. Krosnick